

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Third Periodic Review of the)	MB Docket No. 07-91
Commission's Rules and Policies)	
Affecting the Conversion)	
To Digital Television)	

COMMENTS OF
HARRIS CORPORATION

Harris Corporation ("Harris") respectfully submits these comments in response to the Federal Communications Commission's ("Commission's" or "FCC") Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding concerning the transition of the nation's broadcast television system from analog to digital television ("DTV").¹

I. Introduction and Summary

Harris is an international communications equipment company with four product offerings in the microwave, broadcast, secure tactical radio, and government communications systems markets. As the world's leading broadcast transmission equipment supplier, Harris' Broadcast Communication Division is the leader in digital solutions for television and radio broadcasting and has been at the forefront of the transition to digital television, supplying the majority of the digital television transmitters and

encoders in the United States. Moreover, Harris has been engaged in developing broadcast technologies as evidenced by its long-standing participation in the ATSC. Harris is represented on the ATSC board of directors and is actively engaged in the work of the planning committee and the technical standards group.

The Harris customer base includes, both licensed and unlicensed service providers, serving a variety of markets including 802.11, 802.15, 802.16, analog and digital television, and software-defined radio. Our customers include cellular service providers, wireless ISPs, broadcasters, and agencies engaged in public safety. Harris is in the unique position of understanding the issues presented in the NPRM from the perspectives of several key stakeholders: the broadcasting industry, the public safety industry, and the wireless industry. As such, Harris supports the Commission's efforts to move the digital transition forward and provide for an efficient process by which all broadcasters will be broadcasting in digital at full power by February 17, 2009.

II. Discussion

Harris would like to address the issues relating to reduction and termination of analog service; the ATSC DTV transmission standard and the

¹ *In the Matter of Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, NPRM, MB Docket No. 07-91 (rel. May 18, 2007).

development of a Commission process to facilitate improvements to the DTV standard.

A. Reduction and Termination of Analog Service Prior to Feb. 17, 2009

In the NPRM, the Commission recognized that some stations may find it desirable to reduce or terminate analog operations before the February 17, 2009 transition date.² Harris is cognizant of the obstacles confronting broadcasters when building out stations' digital facilities. One major impediment is the lack of available construction crews to work on transmitter installations and transmitter channel conversions. Harris agrees with the Commission that the Congressional mandate of February 17, 2009 weighs in favor of an increasing tolerance for the loss of analog service as the switch over date approaches. Harris agrees that reducing or terminating analog service before February 17, 2009 will enable construction crews to work on a staggered schedule to facilitate the transition. The reality is that the goal of efficient, timely transition must come at a price: either analog service is reduced or terminated prior to the hard date or the Commission must concede that the hard date is only the end of analog; not necessarily the beginning of full, digital operations. Because the latter is not consistent with the congressional mandate or the public interest, the Commission should permit

² *Id.* at para. 37.

a reduction/termination in analog services as a necessary compromise to facilitate the February 17, 2009 hard date.

Similarly, Harris supports stations seeking to operate in new channels before the February 17, 2009 hard date as long as those stations do not cause impermissible interference to other stations.³ Early transitions could advance the transition by freeing the transition resources for those stations building later as well as ensure equipment manufacturers are not unduly stressed by last-minute orders.

B. DTV Transmission Standard

Harris strongly supports the Commission's proposals to update its rules to reflect improvements made to both the ATSC DTV transmission standard and the ATSC Program System and Information Protocol ("PSIP") standard.

Specifically, Harris supports the update of the DTV transmission standard to A/53 Revision E, with Amendments No. 1 and 2 ("A/53-E"). As the Commission noted, adoption of the A/53-E transmission standard will allow broadcasters to use the ATSC's Enhanced 8-VSB standard to create a robust digital channel that is fully backwards-compatible with the current digital signals. Harris also supports the update of the PSIP standard to A/65-C. The A/65-C PSIP standard improves service to the public by allowing DTV receivers to display additional information about available programming.

³ *Id.* at para. 88.

The FCC has recognized that one of the many benefits of ATSC DTV standard is the ability to improve and enhance the ATSC DTV technology over time. As the Commission is aware, many of the amendments proposed in the DTV standard are minor improvements to the standard that do not impact operating parameters. For example, many of the amendments proposed to the ATSC DTV transmission standard over the course of the years have not impacted the emission mask, power levels, and interference levels or resulted in disenfranchisement of existing DTV receivers. As these standards continue to evolve, we urge the Commission to keep pace by establishing a streamlined process for updating its rules to recognize important ongoing upgrades to the ATSC standards already incorporated into the Commission's DTV regulations.

III. Conclusion

Harris commends the Commission for its tremendous effort, dedication and hard work in ensuring the digital television transition is seamless and that the needs of industry and the public are served. The Commission's task is not an easy one. It must ensure that broadcasters are provided with the regulatory support they need to effectuate the transition while simultaneously ensuring that the February 17, 2009 hard date is met and that the public is provided with uninterrupted service. In keeping with these objectives, Harris urges the Commission to permit the reduction/termination of analog service, grant broadcasters the opportunity

to transition to digital early and adopt the DTV transmission standards proposed in the NPRM.

Respectfully submitted,

HARRIS CORPORATION

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